

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SOPHIA MENA,

Plaintiff,

v.

BRABBLE, INC., a corporation;
BRABBLETV.COM LLC, a corporation;
JEFFREY DEPALMA, an individual;
PATRICK MACARONIS, an individual;
PETER KAHN, an individual;

Defendants.

Case No. 1:16-cv-04075-WHP

NOTICE OF MOTION FOR DEFAULT

PLEASE TAKE NOTICE that upon the Declaration of Alexander L. Gastman, Esq., dated October 31, 2016, with all exhibits annexed thereto, as well as the Memorandum of Law in Support of Plaintiff's Motion for Default Judgment and Damages also dated October 31, 2016, and upon all other pleadings and proceedings heretofore had herein, at the Courthouse located at 500 Pearl Street, New York, New York 10007, on the return date to be set by the Court, that Plaintiff, SOPHIA MENA ("Plaintiff Mena"), will move this Court for an Order pursuant to Federal Rule of Civil Procedure 55(b)(2) for the entry of default against Defendant BRABBLE INC., Defendant BRABBLETV.COM LLC, Defendant JAMES ("JIM") TROLICE ("Defendant Trolice"), Defendant PATRICK ("PAT") G. MACARONIS ("Defendant Macaronis"), Defendant JEFFREY DEPALMA ("Defendant DePalma"), and Defendant PETER KAHN ("Defendant Kahn") (collectively as "Defendants"), and awarding Plaintiff Mena: (1) actual damages under the Fair Labor Standards Act ("FLSA") and/or New York Labor Law ("NYLL")

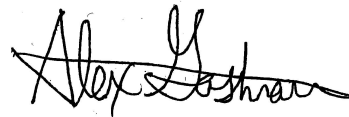
in the amount of \$105,969.43; (2) liquidated damages under the FLSA and/or NYLL in the amount of \$105,969.43; (3) statutory damages under the NYLL in the amount of \$5,000; (4) pre-judgment interest under the NYLL in the amount of \$27,579.63; (5) post-judgment interest on all monies due at a daily rate to be determined by the Clerk of the Court until the Defendants comply with the judgment; and (6) any such other and further relief as the Court deems proper.

PLEASE TAKE FURTHER NOTICE because a briefing schedule has not been set by the Court, should the Defendants wish to oppose any portion of this motion, such opposition is to be submitted in accordance with any schedule to be agreed to by the parties and/or adopted or ordered by the Court, with any reply papers to be served in accordance with any such schedule.

Dated: New York, New York

Respectfully submitted, this **31th** day of **October, 2016**.

ANDERSONDODSON, P.C.



Alexander L. Gastman (AG 8241)

alex@andersondodson.com



Penn Dodson (PD 2244)

penn@andersondodson.com

Attorney for Plaintiffs

cc: Brabble Inc.
BrabbleTV.com, LLC
95 Horatio St. Apt. 215
New York, NY 10014

James ("Jim") Trolice

95 Horatio St. Apt. 215
New York, NY 10014

Patrick ("Pat") G. Macaronis
95 Horatio St. Apt. 215
New York, NY 10014

Jeffrey DePalma
95 Horatio St. Apt. 215
New York, NY 10014

Peter Kahn
95 Horatio St. Apt. 215
New York, NY 10014

11 Broadway
Suite 615
New York, NY 10004
212.961.7639 tel
646.998.8051 fax